BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NO. 2021-130-S

Joint Application for Approval of the Sale of		
Assets and Transfer of Facilities, Territory		
and Certificate of Public Convenience and		
Necessity from Synergy Utilities, L.P. to		
South Carolina Water Utilities, Incorporated		

PETITION TO INTERVENE

Petitioner the Northwood Estates Homeowners Association ("Petitioner") hereby petitions the South Carolina Public Service Commission (the "Commission"), pursuant to Rule 103-825 of the Commission's Rules, for an order allowing Petitioner to intervene in the above referenced Docket, with full rights to participate as a party of record. In support of its petition, Petitioner would show the Commission the following:

- 1. Northwood Estates Homeowners Association is an association representing approximately one hundred homeowners in Orangeburg, South Carolina.
- 2. Northwood Estates Homeowners Association is a customer and user of the services of the services of Synergy Utilities, L.P., services which it alleges are inadequate and inequitable.
- 3. Northwood Estates Homeowners Association 's legal representative in this proceeding, to whom all notices, pleadings and other documents related to this proceeding should be directed, is:

 Skyler B. Hutto. Williams & Williams
 1281 Russell St. Orangeburg, SC 29115
- 4. As a customer of water and sewer services of Synergy, Petitioner has a direct and substantial interest in the matters to be addressed by the Commission in this Docket, and no other party to this Docket can adequately represent Petitioner's interests in these proceedings.
- 5. Additionally, the Application in this Docket posits that the "public interest is served by having utility ownership committed to operating the utility and investing the necessary capital required for sustainable, efficient operation." Petitioner is interested in the potential investment of capital in the aging and inefficient Synergy system used by Petitioner.
- 6. Petitioner should therefore be permitted to intervene in this proceeding to participate fully and present testimony and other evidence in this Docket as appropriate.
- 7. Petitioner is currently opposed to the sale represented in this Docket. However, Petitioner reserves the right to set forth and amend its position more fully as necessary and appropriate as this proceeding moves forward.

WHEREFORE, Petitioner prays for the Commission to:

- a. Grant this Petition to Intervene and make Petitioner a party of record in Docket No. 2021-130-
- S, allowing Petitioner to participate fully and take such positions as it deems advisable; and
- b. Grant such other relief as the Commission deems just and proper.

Respectfully submitted,

WILLIAMS & WILLIAMS

BY: s/Skyler B. Hutto #102741

1281 Russell St.

Orangeburg, SC 29118

803-534-5218

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This is to certify that I have caused to be served this day, the Petition to Intervene to the individuals listed below via first class mail or electronic mail as set out below:

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Orangeburg, SC

<u>s/ Skyler B. Hutto</u> #102741

1 June, 2021

Skyler B. Hutto